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10 Attorneys for Defendants

11 PIPEWRENCH II, INC., G-2 PARTNERS, LLC (f/k/a G2 Capital
12 Advisors, LLC) and SANKATY ADVISORS, LLC

13 UNITED STATES DISTRICT COURT

14 DISTRICT OF NEVADA

16 EVE BORTON, Individually and on
17 Behalf of all Others Similarly Situated,

18 Plaintiff,

19 vs.

20 INTERSTATE ACQUISITIONS, LLC, a
Delaware limited liability company;
21 INTERSTATE PLUMBING & AIR
CONDITIONING, LLC, a Nevada limited
liability company; PIPEWRENCH II,
INC., a Delaware Corporation; G-2
23 CAPITAL ADVISORS, LLC, a Delaware
limited liability company; SANKATY
ADVISORS, LLC, a Delaware limited
liability company; and DOES 1-100,
25 inclusive,

26 Defendants.

Case No. 2:11-cv-01580-JCM-RJJ

JOINT STATUS REPORT

27
28 **JOINT STATUS REPORT**

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Pursuant to this Court's Order dated March 7, 2012 (Doc No. 25), Defendants PIPEWRENCH II, G-2 PARTNERS, LLC (f/k/a G2 Capital Advisors, LLC) and SANKATY ADVISORS, LLC (collectively "Defendants") and Plaintiff EVE BORTON hereby provide the following Joint Status Report:

1. Set forth the status of the action, including a list of any pending motions and/or other matters which require the attention of this Court.

Plaintiff filed her Complaint on September 29, 2011. Defendants Pipewrench II and Sankaty Advisors answered the Complaint on October 20, 2011. Defendant G-2 Partners, LLC answered the Complaint on November 9, 2011. Thereafter, Defendants collectively submitted an Amended Answer on November 10, 2011.

Following the filing of the aforementioned pleadings, the parties proceeded to engage in settlement discussions. On or about January 23, 2012, the parties filed a Stipulation and [PROPOSED] Order to Hold Case Deadlines in Abeyance and Stay Discovery ("Stipulation"). The Stipulation states that the claims against Defendants Interstate Acquisitions, LLC and Interstate Plumbing & Air Conditioning, LLC (the "Interstate Defendants") are currently stayed by the automatic bankruptcy stay by virtue of the Interstate Defendants having filed voluntary Chapter 7 bankruptcy petitions in September 2011. The Stipulation further states that the parties are engaged in settlement negotiations, and requests that the Court hold all deadlines in abeyance.

The Court issued an Order on March 7, 2012, granting the parties request to hold all deadlines in abeyance and ordering that the parties submit a joint status report on or before March 30, 2012 regarding settlement status.

The parties are still engaged in ongoing settlement negotiations and thus, request that this Court continue to hold all deadlines in abeyance. The parties will submit another joint status report to the Court on or before April 30, 2012, regarding the status of settlement negotiations.

1
2. **Include a statement by counsel of action required to be taken by this
court.**

3
The parties request that the court enter the attached proposed Order, to continue to
4 hold all deadlines in abeyance and order that the parties submit another joint status report on or
5 before April 30, 2012 regarding the status of settlement negotiations.

6
7. **Include as attachments copies of any pending motions, responses and
replies thereto and/or any other matters requiring the court's attention not previously
8 attached to the notice of removal.**

9
Exhibit A: [PROPOSED] Order to Continue to Hold Case Deadlines in Abeyance
10 and Stay Discovery.
11

12 March 30, 2012

March 30, 2012

14 *s/Stephen C. Grebing*

15 STEPHEN C. GREBING, ESQ.
16 WINGERT GREBING BRUBAKER &
GOODWIN LLP

17 JAY KENYON, ESQ.

18 Attorneys for Plaintiff
EVE BORTON

s/Daniel L. Thieme

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Pro Hac Vice

Attorneys for Defendants
PIPEWRENCH II, INC., G-2 PARTNERS, LLC
(f/k/a G2 Capital Advisors, LLC) and SANKATY
ADVISORS, LLC

CERTIFICATE OF SERVICE

I am a resident of the State of Nevada, over the age of eighteen years, and not a party to the within action. My business address is 3960 Howard Hughes Parkway, Suite 300, Las Vegas, Nevada 89169-5937. On March 30, 2012, I served the within document(s):

JOINT STATUS REPORT

- By CM/ECF Filing – Pursuant to FRCP 5(b)(3) and LR 5-4, the above-referenced document was electronically filed and served upon the parties listed below through the Court's Case Management and Electronic Case Filing (CM/ECF) system:

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Attorneys for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct. Executed on
March 30, 3012, at Las Vegas, Nevada.

Kimberly A. Gregos

EXHIBIT A

EXHIBIT A

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26 Case No. Case No. 2:11-cv-01580-JCM-RJJ

27
28 [PROPOSED] ORDER TO CONTINUE TO
HOLD CASE DEADLINES IN ABEYANCE
AND STAY DISCOVERY

[PROPOSED] ORDER TO CONTINUE TO HOLD CASE
DEADLINES IN ABEYANCE AND STAY DISCOVERY

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Because Plaintiff and Defendants Pipewrench II, G-2 Capital Advisors, LLC, and Sankaty Advisors, LLC are engaged in ongoing settlement negotiations, it is hereby ordered that all case deadlines will continue to be held in abeyance, including all discovery, and that the parties will submit a joint status report on or before April 30, 2012 regarding the status of settlement negotiations.

IT IS SO ORDERED.

Dated this ____ day of _____, 2012.

**UNITED STATES DISTRICT/MAGISTRATE
JUDGE**

[PROPOSED] ORDER TO CONTINUE TO HOLD CASE DEADLINES IN ABEYANCE AND STAY DISCOVERY